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FILED  
CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK

★ DEC 17 2010 ★

LONG ISLAND OFFICE

WHETSEL WADE,  
Petitioner.

) Criminal Case No.: CR-05-16 (JS)

)

)

SEYBERT, J.

-vs.-

)

)

UNITED STATES OF AMERICA,  
Respondent.

) UNITED STATES DISTRICT JUDGE  
) JOANNA SEYBERT

)

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PETITIONER WHETSEL WADE'S  
MOTION FOR RETURN OF PROPERTY  
PLEDGED AS PRE-TRIAL BOND.

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COMES NOW, the Petitioner, Whetsel Wade, in propria personam, sui juris, acting as his own Counsel, pursuant to the Federal Rules of Criminal Procedure, and files this his Motion For Return Of Property Pledged As Pre-Trial Bond. In support of which he states as follows:

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1. The Defendant, Whetsel Wade, files the instant Motion seeking the return of property pledged as bail bond for Defendant's release from custody, pre-trial.

2. Defendant was arrested on or around 03-05-05, and was released on bail/bond on approximately 12-23-05.

3. To secure the Defendant's appearance, this Court required that Mr. Wade's mother, Ms. Yvonne Wade, pledge her house as Wade's bail bond. Accordingly, Ms. Wade turned over the deed to her house, at 802 Crescent Street, Brooklyn, NY 11208, to this Honorable Court, and Mr. Wade was then released from custody.

4. Mr. Wade was returned to custody on or about April 16, 2009. He was sentenced on or around 08-14-09. He has remained in custody since that time, and remains incarcerated today. Nonetheless, Ms. Wade's house has not been released from the bail bond pledge, and this Court has not returned her deed.

5. The purpose of the property bond was to guaranty the appearance of Mr. Wade at all scheduled court appearances. Mr. Wade appeared for all appearances, and is now in custody of the United States Federal Bureau of Prisons. There is no longer any need for Ms. Wade's house to be encumbered.

6. Mr. Wade respectfully requests that this Honorable Court release his mother's house from the obligation, and return the deed to her house to her.

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7. Mr. Wade submits that the instant motion is filed in good faith.

8. Mr. Wade has not conferred with Counsel for the government with respect to this Motion, but cannot imagine they would have an objection.

Wherefore, the Defendant Wade respectfully requests that this Honorable Court:

1. Release His Mother Yvonne Wade, From All Obligations As A Surety In His Case;
2. Release His Mother, Yvonne Wade's House From The Bond It Was Pledged For; and
3. Return Ms. Yvonne Wade's Deed To Her Home At 802 Crescent Street, Brooklyn, NY 11208.

Respectfully Submitted:

*Whetsel Wade*

Mr. Whetsel Wade  
Fed. Reg. #71574-053  
FCI Big Spring  
1900 Simler Avenue  
Big Spring, TX 79720  
Defendant, Pro se

11-30-10